

Exhibit 1

From: [Rose, Nina R](#)
To: valpec@kirklandpackard.com
Cc: [Davidson, Jessica](#); [Cano, Roberto](#)
Subject: In re Valsartan - ZHP Defendants' Designations for Certain Witnesses
Date: Friday, February 2, 2024 8:13:27 PM
Attachments: [Christopher Miranda 4.29.21 Affirmative Designations Chart.DOCX](#)
[Jorge Lopez 4.29.21 Affirmative Designations Chart.DOCX](#)
[Margaret Finn 7.30.21 Affirmative Designations Chart.DOCX](#)
[Tiffanie Mrakovich 7.22.21 Affirmative Designations Chart.DOCX](#)
[Tiffanie Mrakovich 8.31.21 Affirmative Designations Chart.DOCX](#)
[Jucai Ge 5.27.2022 Affirmative Designations Chart.DOCX](#)

Counsel:

In connection with the March 2024 TPP class trial, please find attached the ZHP Defendants' proposed deposition designations for the following witnesses:

- Jorge Lopez (4/29/21)
- Christopher Miranda (4/29/21)
- Margaret Finn (7/30/21)
- Tiffanie Mrakovich (7/22/21 & 8/31/21)

Also attached are the ZHP Defendants' proposed deposition designations for the following ZHP witness:

- Jucai Ge (5/27/22)

The designated ZHP witness is located outside of the United States, and her deposition testimony has been designated in the event that she is unavailable to testify in person at the time of trial. The ZHP Defendants reserve the right to serve additional affirmative designations for other ZHP Defendant witnesses unavailable at the time of trial, and further reserve the right to present such witnesses in person should circumstances permit.

The ZHP Defendants reserve the right to supplement, amend, edit, modify, or withdraw the attached designations prior to or during trial, and to serve further affirmative designations for these and other witnesses.

Best,
Nina

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.
